

**REMARKS**

Applicant hereby responds to the Office Action of May 19, 2006, in the above-referenced patent application. Claims 1-27 are pending in the above-referenced patent application.

Claims 1, 6, 7, 9, 10, 11, 16, 17, 19, 20, 21, 23, 24, 26 and 27 were provisionally rejected under the judicially created doctrine of obviousness-type double patenting as being unpatentable over Claims 1, 6 and 11-13 of co-pending Application No. 09/592,598, in view of U.S. Patent No. 6,523,696 to Saito et al. ("Saito"). The Examiner has again noted a Terminal Disclaimer filed by Applicant on June 10, 2005 to overcome the double patenting rejections, but has again maintained the rejections pending official decision by the office paralegal regarding acceptance of the Terminal Disclaimer. Applicant notes the Examiner's remarks in this regard, and reserves the right to provide further arguments and/or documents (including additional Terminal Disclaimers) in support of allowance of the claims in case the Terminal Disclaimer is not accepted.

Claims 1-27 were rejected under 35 U.S.C. 102(e) as being anticipated by U.S. Patent No. 6,523,696 to Saito et al. ("Saito"). Rejection of the claims is respectfully traversed because, for at least the following reasons, Saito does not disclose all of the limitations of the claims.

Claims 1, 6, 7, 16 and 23 have been amended. The amendments are supported by the specification, and are to further clarify the limitations of the claims to place the claims in better condition for allowance. No new matter has been added.

Applicant respectfully traverses the Examiner's arguments, and interpretations of Saito, in the Office Action (pages 10-12, paragraphs (a)-(h)), because for at least the following reasons, Saito does not provide any support for the Examiner's arguments and/or interpretations.

In col. 22, line 66 to col. 22, line 23 (relied on by the Examiner), Saito does not teach obtaining information from the interface device about the second devices connected to the second network said information including graphical and/or textual information, as claimed. Indeed in col. 22, line 12 to col. 22, line 23, according to Saito the codes from the configuration ROM are not displayed to a user, rather, more familiar terms are displayed to a user. Saito does not teach that such more familiar terms (e.g., text, icons, or the like), are obtained from the configuration ROM for display to users (indeed, as stated by Saito, the configuration ROM includes codes not familiar to users). By contrast, according to the present invention, information about the second devices connected to the second network is obtained from the interface device, wherein the information includes graphical and/or textual information. At least for these reasons, the Examiner has not met the burden of showing that Saito teaches the claimed limitations.

In col. 35, lines 11-29 (relied on by the Examiner) or elsewhere, Saito does not disclose generating a user interface description based at least on the obtained information, the user interface description including at least one graphical and/or textual reference of said first devices that are currently connected to the first network, and at least one graphical and/or textual reference of said second devices that are currently connected to the second network, as claimed. In col. 35, lines 11-29, Saito states that: “Then, the icon or character string obtained at the step S103 is attached to the ‘home page of devices at my home’. The above processing is carried out for all the service providing devices contained in the second home network, so as to produce the home page as shown in Fig. 28 (step S104).” As such, Saito describes a home page of devices that includes text/icons. There is no disclosure of generating a user interface description, from which a user interface is generated and shown to the user. The Examiner’s reference to the example in Fig. 5 of the captioned patent application is to the example user interface top page 220, not to the example user interface description 250 from which the user interface top page 220 is generated (see, for example, Figs. 9A-C and page 33, line 24 to page 35, line 4, of the specification of the captioned patent application). At least for these reasons, the Examiner has not met the burden of showing that Saito teaches the claimed limitations.

In col. 28, lines 15-33, figs. 19-21 (relied on by the Examiner) or elsewhere, Saito does not disclose using each reference in a user interface description to access the associated information in each corresponding device; generating the user interface including device data corresponding to each device using the accessed information in each device; and displaying the

user interface on said device capable of displaying a user interface, as claimed. In col. 28, lines 15-33, Saito states that a user operates the device 204 “to obtain video data” from the DVD player 208 and displays the obtained video data on TV 207. However, this has nothing to do with using each *reference* in a user interface *description* to access the device information in each corresponding device, from which device information a user interface for each device is generated and displayed, as claimed.

Saito further mentions that the user clicks an icon of the DVD player on the display of Fig. 20. Then, a group of operation buttons for operating the DVD player will be displayed on the screen as shown in Fig. 21, for example. However, there is no teaching by Saito that such buttons are obtained by using *reference* in a user interface *description* to access the DVD player and obtain the buttons from the DVD player itself.

By generating a user interface description with references to devices, and then using the references to the devices to obtain information from the devices to generate a user interface, the present invention provides a useful layer of abstraction to allow use of alternative file names and types for e.g., identification graphics in the network devices without need for change in the user interface description generated in each device. Saito does not teach such limitations and does not provide such layer of abstractions which the present invention provides. At least for these reasons, the Examiner has not met the burden of showing that Saito teaches the claimed limitations.

Saito does not disclose that the interface device includes an address extension table for the second devices and that obtaining information from the interface device, wherein the address extension table is used to access said second devices. The Examiner states that assigned port addresses for air conditioner 253 (Fig. 16C) and the microwave 254 are registered information for which the PC 210 is the proxy, and that "these port addresses have to be stored in form of a table of addresses." However, there is no disclosure in Saito that such information is in a table of addresses. Nor does Saito require that such information must be stored in the form of a table of addresses as the Examiner suggests without providing any support in Saito.

As described in Saito (col. 24, line 20 to col. 25, line 3), the air conditioner and microwave oven service on LON are registered into the second AV connection device 205 as a result of the service registration. The PC210 is a proxy, and the second AV connection device 205 recognizes the air conditioner service and the microwave oven service as services provided at the PC 210. As such, as a result of this registration, an external terminal interprets that the air conditioner service and the microwave oven service are existing on the PC 210, and that these services are provided as IP level services. When it is desired to make an access to the air conditioner service on the home automation network 212, the external terminal makes an access to the port number "15000" of the PC 210, whereas when it is desired to make an access to the microwave oven service, the external terminal makes an access to the port number "15001" of the PC 210. On the other hand, when there is an access to the port number "15000," the PC 210

interprets that as a service request directed to the air conditioner, whereas when there is an access to the port number "15001," the PC 210 interprets that as a service request directed to the microwave oven. Then, the PC 210 translates the received IP control command into a LON control command and sends this toward the actual device (the air conditioner 213 or the microwave oven 214) on the home automation network 212.

As such, Saito only discusses using port addresses in the PC 210 for the connecting devices 254, 253 which is different from an address extension table and the port addresses in Saito do not form an extension table. PC 210 is a proxy, and registers services in device 250, wherein as the above description in Saito clearly shows, no address extension as claimed is utilized in Saito. Nor does not Saito teach an extension table that includes IP addresses for the second devices in the second network. At least for these reasons, the Examiner has not met the burden of showing that Saito teaches the claimed limitations.

Saito does not disclose that an interface device comprises a bridge device. Saito has no mention of a bridge for connecting two different networks. The only places in Saito where a bridge is even mentioned, is where Saito teaches away from bridges. In col. 12, lines 31 - 34 Saito teaches away from using bridges. In col. 17, lines 43-57, Saito again teaches away from using bridges. Applicant respectfully requests that the Examiner address such disclosures in Saito that teach away from using a bridge. Regarding PC 210 relied on by the Examiner; Saito

described PC 210 as an IP terminal (col. 19, lines 6-10). At least for these reasons, the Examiner has not met the burden of showing that Saito teaches the claimed limitations.

Saito does not disclose using a reference, such as a link, in a user interface description to access the device information of a device connected to the network, and then generate a user interface based on the accessed information for display, as claimed. Saito does not describe a mechanism of generating the various display screens that is even remotely similar to that claimed. In col. 21, lines 40-52 and col. 22, lines 15-26 (relied on by the Examiner), Saito mentions that service information about the devices in network 212 is stored in the configuration ROM of PC 210, and that this ROM is accessed to obtain information about the devices.

There is no disclosure in Saito of a reference in a user interface description to access the device information *stored* in a device connected to the network, and then generate a user interface based on the accessed information for display. In Saito, accessing the configuration ROM in PC 210 for information about devices connected to PC 210 has nothing to do with using a reference/link to access the devices themselves to obtain device information in them, for generating a user interface, as claimed. At least for these reasons, the Examiner has not met the burden of showing that Saito teaches the claimed limitations.

Saito does not disclose generating a user interface description by associating a hyper-text link with the device information of one or more of said first and second devices, as claimed.

Saito does not disclose that the hyper-text links in the user interface description are used to access information associated with the devices currently connected to the network in order to generate a user interface for user interaction, as claimed. In col. 33, line 57 to col. 34, line 8 (relied on by the Examiner), Saito simply describes a home page that may be reached through a hyperlink from an icon, and when such an icon is clicked, the home page of a corresponding device is displayed. Saito only describes that a home page includes icons that when clicked show the home page of a corresponding device.

The Examiner is basically suggesting that clicking a link on a GUI to display the home page of a device, is the same as associating a hyper-text link with device information in network devices, and using the links to access the information in the devices to generate a user interface for display. Reaching a home page via a hyperlink in Saito, is not the same as using a hyper-text link from a user interface description to access device information in devices and generating a user interface from the accessed information, as claimed. No such steps are disclosed in Saito.

Saito does not describe generating a user interface description, as discussed in relation to Claim 1. Saito does not describe that the user interface description includes hyper-text links to information of the devices currently connected to the network. Saito does not disclose that the hyper-text links in the user interface descriptions are used to access information associated with the devices currently connected to the network in order to generate a user interface for user



interaction. At least for these reasons, the Examiner has not met the burden of showing that Saito teaches the claimed limitations.

Saito does not disclose a user interface description. Further, Saito does not disclose that the user interface description includes references to device information of the devices currently connected to the network. Nor does Saito teach that the references in the user interface description are to user control interfaces in each corresponding device, wherein the user control interfaces are accessed using the references in the user interface description and shown on a display as a user interface.

The Examiner concludes that every device in network of Fig. 7 has to have a specific user control interface that can be generated as icon in Fig. 14 and be accessed and controlled through a reference in a user interface description. In Fig. 14, col. 23, lines 12-23 and col. 25, lines 34-59 (relied on by the Examiner), Saito simply describes a screen display, and does not in anyway disclose that the device information in a device includes a user control interface. In col. 23, lines 12-23, col. 25, lines 34-59 Saito describes Figs. 14 and 17 as a list of generic icons for services in the network, and that the user can make an access to a desired service by specifying that service using a prescribed user interface. The Examiner has not reasonably addressed: (1) Where does Saito require that icons in Figs. 14 and 17 come from the devices themselves? (2) Where does Saito require that each device has to have a specific user control interface? (3) Where does Saito require that user control interface for each device is stored in the device itself? and (4) Where

does Saito require that a reference is used to access a user control interface stored in each device to then display the user control interface of that device?

There is no disclosure whatsoever of a user interface description in Saito that includes references to device information of the devices currently connected to the network. Further, in Fig. 14, col. 23, lines 12-23 and col. 25, lines 34-59 (relied on by the Examiner), Saito does not teach that the references in the user interface description are to user control interfaces in each corresponding device, wherein the user control interfaces are accessed using the references in the user interface description and shown on a display as a user interface. Saito does not describe that the actual screen display is stored in a device connected to the network. Saito does not disclose that a device connected to the network has a specific user control interface therein, which is then accessed via a reference in a user interface description to generate a user interface that displays the specific user control interface of that device for user interaction. At least for these reasons, the Examiner has not met the burden of showing that Saito teaches the claimed limitations.

Hereinbelow, Applicant provides further arguments below in support of allowance of the claims over the references cited by the Examiner in specific rejections of Claims 1-27 in the Office Action.

**Regarding Claim 1**, Saito does not disclose providing user interfaces in a first network including first devices interconnected via a communication medium and at least one interface

device connecting said first network to at least a second network having interconnected second devices. Saito does not disclose obtaining graphical and/or textual information from the interface device about the second devices connected to the second network. Nor does Saito disclose obtaining information from said first devices currently connected to the first network wherein the information includes graphical and/or textual information.

The Examiner has interpreted Saito to disclose first and second network 203 connected by an interface device 210, and obtaining information from devices connected to first and second networks (Fig. 7, col. 21, lines 5-10). However, in col. 21, lines 50-60, Saito does not disclose: “(b) obtaining information from the interface device about the second devices connected to the second network, said information including graphical and/or textual information.” In col. 21, lines 50-60, Saito states: “In order to make this fact known to the terminals on the second 1394 bus 203, information (service information) about the home automation network 212 is also stored in the configuration ROM of the PC 210. First, an information indicating that the home automation service is provided is stored in the configuration ROM at a section 234. Then, as directories dependent on that unit, an information indicating that the air conditioner service is provided and an information indicating that the microwave oven service is provided are described in the configuration ROM at sections 235 and 236, respectively.”

As is clear from the above quoted passage, Saito does not require that the service information in the ROM about A/C 213 or M/O 214 comprises “graphical and/or textual

information,” as required by Claim 1. Nowhere does Saito disclose such limitations.

Saito does not disclose: “(c) generating a user interface description based at least on the obtained information, the user interface description including: (1) at least one graphical and/or textual reference of said first devices that are currently connected to the first network, and (2) at least one graphical and/or textual reference of said second devices that are currently connected to the second network; and displaying a top level user interface based on the user interface description on a device connected to the first network capable of displaying a user interfaces,” as required by Claim 1.

In Fig. 14, and col. 23, lines 12-23 (relied on by the Examiner), Saito only states that Fig. 14 is a diagram showing an exemplary screen display in the case of device specific display in the network system of Fig. 7. As such, Fig. 14 shows a screen display, not a user interface description as claimed herein. As claimed herein, the user interface description is first generated and then in another step, that user interface description is utilized to generate and display one or more user interfaces. Saito does not disclose such limitations, and the Examiner has not shown where such a user interface description is taught by Saito. In the present invention the user interface description and the user interface, are two different things, which the Examiner continues to overlook.

Relying on Saito, col. 21, lines 40-52 and col. 22, lines 15-26, the Examiner suggests that in order to generate the graphical user interface in one of the terminal devices connected to the first 1394 BUS network as shown in Fig. 14, the terminal devices connected to the 1394 bus have to obtain user interface description of the home automation network devices 212 stored in the configuration ROM. However, it is respectfully submitted that obtaining device information, and generating a user interface description from the device information are two different steps, and that Saito does not disclose generating a user interface description as claimed herein.

In col. 21, lines 40-52, Saito states: “Now, the PC 210 is also connected to the home automation network 212 so that it also functions as a home automation server. Namely, in the configuration of this embodiment, this PC 210 carries out controls of various devices (the air conditioner 213 and the microwave oven 214) connected to the home automation network 212. In other words, this implies that a terminal connected to the second 1394 bus 203 can control various devices connected to the home automation network 212 by making access to this PC 210. In order to make this fact known to the terminals on the second 1394 bus 203, information (service information) about the home automation network 212 is also stored in the configuration ROM of the PC 210.”

In col. 22, lines 15-26, Saito states: “Here, the information about terminals (the air conditioner 213 and the microwave oven 214) connected to the PC 210 via the home automation network 212 is stored as the terminal specific information at sections 243 and 244 respectively.

By referring to this information, it becomes possible for the other 1394 nodes to obtain not only the information on nodes connected to the 1394 bus but also the information on the other nodes (the air conditioner 213 and the microwave oven 214 in this embodiment) connected with the node that is connected to the 1394 bus, both at the 1394 level, so that this is quite effective for integrated management and control of the home network.”

In neither of the above passages (col. 21, lines 40-52 and col. 22, lines 15-26), does Saito disclose generating a user interface description as claimed. The screen display in Fig. 14 is not a user interface description, and Saito does not disclose that a user interface description is generated. It is respectfully submitted that the Examiner has not addressed the distinction between Saito and the claimed limitations. It is noted that even if the Examiner’s statement above is accurate (which Applicant does not believe it to be), still Saito does not disclose a first step of generating a user interface description from which, in a second step a user interface is created and displayed, as required by Claim 1. The Examiner refers to graphical user interface in Fig. 14 of Saito to be the same as a user interface description as claimed herein. It is respectfully submitted that this is inaccurate. Saito does not disclose the intermediate step of generating a user interface description based on which a graphical user interface is then generated according to the present invention. Where does Saito disclose a graphical user interface as claimed herein?

Saito does not disclose generating a control user interface by using a reference in the user interface description, the reference corresponding to a first device or a second device, to perform

the steps of: using said reference to access the associated information stored in said corresponding device; generating the control user interface including device data corresponding to said corresponding device using the accessed information stored in said corresponding device; and displaying the control user interface for user control of said corresponding device, as required by Claim 1.

First, as discussed above, Saito does not disclose generating a user interface description as claimed. Accordingly, by definition Saito does not disclose using each reference in a user interface description, as required by Claim 1 (emphasis added). The screen display in Fig. 14 is not a user interface description, and Saito does not disclose that a user interface description is generated.

Second, Saito does not disclose using each reference in a user interface description to access the associated information in each corresponding device, generating the user interface including device data corresponding to each device using the accessed information in each device, as required by Claim 1 (emphasis added).

The Examiner has relied on Saito Fig. 14, col. 23 lines 12-23, to interpret Saito to disclose such limitations. This interpretation of Saito is respectfully traversed. In col. 13, lines 12-23 (relied on by the Examiner), Saito states: “Next, Fig. 14 shows an exemplary screen display in the case of terminal specific display. Similarly as in the case of service specific

display, one icon (i11 to i15) is provided for each terminal provided on the second home network, and the user can make an access to a desired service by specifying that service using a prescribed user interface (by executing click or drag-and-drop on a mouse device, for example). Here, the screen display of terminal specific icons shown in Fig. 14 also displays both services connected to the second IEEE 1394 bus 203 and services connected to the home automation network 212 without distinguishing different network types.”

From the above passage, it is clear that the screen in Fig. 14 is a user interface, and not a user interface description is claimed. There is not a single word in Saito col. 23, lines 12-23 (or elsewhere) about using a using a reference to access associated information in each corresponding device, as claimed. For example, Saito does not disclose that a reference is used to access device information in the A/C 213 or M/O 214 (Saito, Fig. 1). Indeed, Saito states that service information about A/C 213 and M/O 214 are stored in the ROM of PC 210 (col. 21, lines 40-52), and that other 1394 nodes access this service information in the ROM of PC210 (*not in the devices 213 or 214*) to obtain information on devices 213 and (col. 22, lines 15-26) . Therefore, in Saito there is no step of using a reference in a user interface description “to access the associated information in each corresponding device,” as required by Claim 1.

Further, Saito does not disclose generating the user interface including device data corresponding to each device using the accessed information in each device, as required by Claim 1. As discussed, Saito does not disclose using each reference in the user interface description to



access the associated information in each corresponding device. Accordingly, Saito cannot, and does not, generate a user interface that includes device data corresponding to each device using the accessed information in each device, as required by Claim 1. For at least the foregoing reasons, rejection of Claim 1 and all claims dependent therefrom should be withdrawn.

**Regarding Claim 4**, Saito does not disclose that the interface device includes an address extension table for the second devices and that obtaining information from the interface device further includes the steps of using the address extension table to access said second devices. In col. 24, line 41 to col. 25, line 3, Saito discusses using port addresses in the PC 210 for the connecting devices 213 and 214, which is different from an address extension table because the port addresses in Saito do not form a table. Nor does not Saito teach an extension table that includes IP addresses for the second devices in the second network.

**Regarding Claim 5**, Saito does not disclose that the interface device is a bridge device. Saito has no mention of a bridge for connecting two different networks. Saito teaches away from using bridges (col. 12, lines 31 - 34 and col. 17, lines 43-57).

**Regarding Claim 6**, Saito does not disclose displaying one or more user interfaces, each based on a user interface description, on one or more devices connected to the first network capable of displaying a user interface, for user control of said first and second devices. Saito does not teach generating a user interface description, and does not teach generating a user

interface based on such a user interface description.

**Regarding Claim 7**, Saito does not disclose generating a user interface description, as claimed. Nor does Saito teach displaying a user interface based on such a user interface description by using each reference in the corresponding user interface description to access the associated information in each device, generating the user interface including device data corresponding to each device using the accessed information in each device, and displaying the user interface on said device capable of displaying a user interface. As discussed in relation to Claim 1, in Fig. 14 and col. 23, lines 12-23, Saito simply shows generic screens where various network elements are each shown as a box with text therein. There is no disclosure in Saito of using a reference, such as a link, in a user interface description to access the device information of a device connected to the network, and then generate a user interface based on the accessed information for display, as claimed. Saito does not describe a mechanism of generating the various display screens that is even remotely similar to that claimed. If Claim 7 is once again rejected, Applicant respectfully requests that the Patent Office provide detailed explanation of how and where such limitations are disclosed in Saito.

**Regarding Claim 8**, Saito does not disclose generating a user interface description by associating a hyper-text link with the device information of one or more of said first and second devices, as required by Claim 8. The Examiner interprets Saito, col. 33, line 57 to col. 34, line 8, as disclosing such limitations. However, Saito simply describes a home page that may be

reached through a hyperlink from an icon, and when such an icon is clicked the home page of a corresponding device is displayed. Saito only describes that a home page includes icons that when clicked show home page of a corresponding device. Saito does not describe generating a user interface description, as discussed in relation to Claim 1. Saito does not describe that the user interface description includes hyper-text links to information of the devices currently connected to the network. Saito does not disclose that the hyper-text links in the user interface description are used to access information associated with the devices currently connected to the network in order to generate a user interface for user interaction.

**Regarding Claims 9 and 10,** Saito does not disclose a user interface description.

Further, Saito does not disclose that the user interface description includes references to device information of the devices currently connected to the network. Nor does Saito teach that the references in the user interface description are to user control interfaces in each corresponding device, wherein the user control interfaces are accessed using the references in the user interface description and shown on a display as a user interface. As discussed in relation to Claim 1, Fig. 14, col. 23, lines 12-23 and col. 25, lines 34-59 in Saito, simply describe a screen display, and does not in anyway disclose that the device information in a device includes a user control interface. Saito does not describe that the actual screen display is stored in a device connected to the network. Saito does not disclose that a device connected to the network has a specific user control interface therein, which is then accessed via a reference in a user interface description to generate a user interface that displays the specific user control interface of that device for user

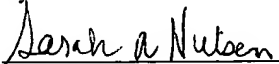
interaction.

**Claims 11-27** were rejected for similar reasons as Claims 1-10, respectively. The rejections are respectfully traversed for at least the reasons provided above in relation to Claims 1-10, respectively. Therefore, for at least these reasons, rejection of Claim 11-20 should be withdrawn. Further, Claims 21-27 are allowable for similar reasons.

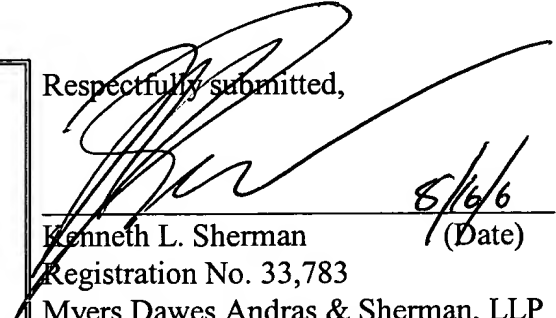
**CONCLUSION**

If necessary, the Commissioner is hereby authorized to charge payment or credit any overpayment to Deposit Account No. 01-1960 for any additional fees required for this filing. A duplicate copy of this page is enclosed for that purpose.

For these and other reasons, it is respectfully submitted that the rejection of the claims should be withdrawn, and all of the claims be allowed. Accordingly, reexamination, reconsideration and allowance of all the claims are respectfully requested.

<p align="center"><b><u>Certificate of Mailing</u></b></p> <p>I hereby certify that this correspondence is being deposited with the United States Postal Service as first class mail in an envelope addressed to: MS Amendment, Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450 on: August <u>16</u>, 2006.</p> <p>By: Sarah Nielsen  Signature</p>
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